

**FILED**

**JAN 14 2018**

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

Kiara Robles  
1733 North Milwaukee Ave  
Chicago, IL, 60647  
Tel: 510-303-9442  
Email: Kiara.robles@gmail.com

*Plaintiff Pro Se*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

KIARA ROBLES,

Case No.: 4:17-cv-04864-CW

Plaintiff,

v.

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA, BERKELEY, et al.

Defendants.

**REQUEST FOR CERTIFICATION OF  
RULING REVOKING LARRY  
KLAYMAN'S PRO HAC VICE  
ADMISSION, STAY OF PROCEEDINGS,  
AND MOTION FOR EXTENSION OF  
TIME TO RESPOND TO DEFENDANT  
RAHA MIRABDAL'S MOTION TO  
DISMISS**

Plaintiff Kiara Robles ("Plaintiff") hereby requests that this Court certify its rulings (1) revoking her counsel of choice, Mr. Larry Klayman's, pro hac vice admission and (2) denying Plaintiff's motion for recusal so that Mr. Klayman can take this issue on appeal immediately to the U.S. Court of Appeals for the Ninth Circuit, where he is licensed to practice. Furthermore, Plaintiff requests that this Court grant a stay of proceedings until which time appellate proceedings have been concluded. This is the only way that Plaintiff's case can proceed, as this Court's rulings have severely prejudiced Plaintiff, leaving her without counsel. Plaintiff has in the past submitted a sworn affidavit from Mr. Michael Kolodzi ("Mr. Kolodzi") that he is unable to represent Plaintiff on his own due to a lack of available time and resources. This affidavit is again attached to this pleading as Exhibit 1.

Mr. Kolodzi will be moving to withdraw as counsel, with Plaintiff's consent, since, as previously stated, he simply cannot represent Plaintiff in this matter on his own. Furthermore, as Plaintiff has sworn to in previously filed sworn affidavits, she has been unable to find any other

1 counsel to step in and take the case. Plaintiff will therefore be left with no counsel at all due to  
2 this Court's decision to revoke Mr. Klayman's *pro hac vice* application, effectively taking  
3 Plaintiff's case out of the hands of a jury, forcing a dismissal of Plaintiff's claims, and denying  
4 Plaintiff any opportunity to receive compensation after having been brutally beaten and  
5 assaulted. Certifying the decision to revoke Mr. Klayman's *pro hac vice* admission and ordering  
6 a stay in the interim is the only way that this case can proceed.

7 Lastly, Plaintiff requests an extension of time *nunc pro tunc* to respond to Defendant  
8 Raha Mirabdal's Motion to Dismiss Second Amended Complaint. As Plaintiff has been left  
9 without counsel following this Court's ruling revoking Mr. Klayman's *pro hac vice* application,  
10 Plaintiff was unable to respond to Defendant Raha Mirabdal's Motion. Plaintiff requests an  
11 extension of time until after her counsel of choice, Mr. Klayman, has had an opportunity to take  
12 the revocation of his *pro hac vice* admission on appeal to respond to Defendant Mirabdal's  
13 Motion to Dismiss Second Amended Complaint.

14 Dated: January 11, 2019

Respectfully Submitted,

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Kiara Robles  
1733 North Milwaukee Ave  
Chicago, IL, 60647  
Tel: 510-303-9442  
Email: Kiara.robles@gmail.com


*Plaintiff Pro Se*

**CERTIFICATE OF SERVICE**

I, Kiara Robles, Plaintiff *pro se* hereby certify that on this day, January 11, 2019, a copy of the foregoing was submitted for filing via Federal Express and served via U.S. mail to:

John Midori Hamasaki  
1388 Sutter Street #805  
San Francisco, CA, 94109

Rachel Lederman  
558 Capp Street  
San Francisco, CA 94110

  
\_\_\_\_\_  
Kiara Robles

# EXHIBIT 1

LARRY E. KLAYMAN (D.C. BAR No. 334581)  
KLAYMAN LAW GROUP, PA  
2020 Pennsylvania Avenue NW, Suite 800  
Washington, DC 20006  
Telephone: 561.558.5536  
Email: leklayman@gmail.com  
*Pro Hac Vice*

MICHAEL D. KOLODZI (CAL. BAR No. 255772)  
THE KOLODZI LAW FIRM  
433 North Camden Drive, Suite 600  
Beverly Hills, California 90210  
Telephone: 310.279.5212  
Facsimile: 866.571.6094  
Email: mdk@mdklawfirm.com

*Attorneys for Plaintiff*  
**KIARA ROBLES**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

KIARA ROBLES,

Plaintiff,

v.

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA, BERKELEY, et al.

Defendants.

Case No.: 4:17-cv-04864

**AFFIDAVIT OF MICHAEL KOLODZI**

1. I, Michael Kolodzi, Esq., hereby being sworn deposes and says that the following is true and correct and based on my personal knowledge and belief.

2. I am over the age of 18 and mentally and legally competent to make this affidavit, sworn under oath.

3. I am local co-counsel of record in the matter of *Robles v. Regents of the University of California*, 4:17-cv-04864.

4. Larry Klayman ("Mr. Klayman") is my co-counsel on this matter and he has been admitted into this case *pro hac vice*.

1           5.     My agreement with Mr. Klayman was that he would serve as lead counsel on this  
2 case.

3           6.     Should this Court revoke Mr. Klayman's *pro hac vice* status, I will be unable to  
4 continue representation of Plaintiff Kiara Robles on my own, due to a lack of available time and  
5 resources.

6           I hereby swear under oath and penalty of perjury that the foregoing facts are true and  
7 correct to the best of my knowledge and belief.

8  
9           DATED: July 21, 2018

A handwritten signature in black ink, appearing to be "J. B.", is written over a horizontal line.

# EXHIBIT 2

LARRY E. KLAYMAN (D.C. BAR No. 334581)  
KLAYMAN LAW GROUP, PA  
2020 Pennsylvania Avenue NW, Suite 800  
Washington, DC 20006  
Telephone: 561.558.5536  
Email: leklayman@gmail.com  
*Pro Hac Vice*

MICHAEL D. KOLODZI (CAL. BAR No. 255772)  
THE KOLODZI LAW FIRM  
433 North Camden Drive, Suite 600  
Beverly Hills, California 90210  
Telephone: 310.279.5212  
Facsimile: 866.571.6094  
Email: mdk@mdklawfirm.com

*Attorneys for Plaintiff*  
**KIARA ROBLES**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

KIARA ROBLES,

Case No.: 4:17-cv-04864

Plaintiff,

v.

**AFFIDAVIT OF KIARA ROBLES**

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA, BERKELEY, et al.

Defendants.

1. I, Kiara Robles, hereby being sworn deposes and says that the following is true and correct and based on my personal knowledge and belief.

2. I am over the age of 18 and mentally and legally competent to make this affidavit, sworn under oath.

3. I am the Plaintiff in the matter of *Robles v. Regents of the University of California*, 4:17-cv-04864.

4. Larry Klayman ("Mr. Klayman") and Michael Kolodzi ("Mr. Kolodzi") are my co-counsel on this matter

1           5.     Should this Court revoke Mr. Klayman's *pro hac vice* status, I do not believe that  
2 I will be able to find another attorney to represent me.

3           6.     Since this case has been filed, I have been threatened by who I believe are  
4 members of Defendant ANTIFA.

5           7.     Even before filing this case, I had enormous difficulty finding an attorney who  
6 would represent me in this matter, especially given the fact that some of the Defendants are  
7 members of ANTIFA.

8           8.     Mr. Klayman is the only attorney that I was able to find who was ready, willing,  
9 and able to file this case and litigate it.

10          9.     If Mr. Klayman is not permitted to represent me, I am certain, given my past  
11 efforts, that I cannot find another attorney to represent me, since Mr. Klayman is representing me  
12 pro bono and because of the risks involved with prosecuting this case given Antifa's very violent  
13 actions which harmed me physically and emotionally. In this event, I will be unable to proceed  
14 with this case and I will lose all of my legal rights.

15          I hereby swear under oath and penalty of perjury that the foregoing facts are true and  
16 correct to the best of my knowledge and belief.

17  
18 DATED: July 24, 2018

